

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION**

JANE DOE,

Plaintiff,

vs.

LIMESTONE UNIVERSITY F/K/A  
LIMESTONE COLLEGE, COLLINS  
MURPHY, MG FREESITES, LTD., d/b/a  
PORNHUB.COM, and HAMMY MEDIA,  
LTD. d/b/a XHAMSTER.COM,

Defendants.

Case No.: 7:21-cv-03193-JD

**HAMMY MEDIA LTD.'S MOTION FOR JUDGMENT ON THE PLEADINGS**

Pursuant to Fed. R. Civ. P. 12(c), defendant Hammy Media, Ltd. (“HML”) respectfully moves for this Court to dismiss Plaintiff's Amended Complaint in its entirety, as it sounds against HML. In support of this Motion, HML states that: (1) it is not subject to personal jurisdiction in this Court, (2) the claims brought by the Plaintiff against HML are barred in their entirety by Section 230 of the Communications Decency Act, and (3) Plaintiff has failed to plead sufficient facts with respect to certain of her claims.

In support of this Motion, and in accordance with Local Rule 7.04, HML relies on the accompanying memorandum.

Respectfully Submitted,

**/s/ Hannah Rogers Metcalfe**

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February 28, 2022

Greenville, South Carolina